

SBK:WMN
F.#2005R1398

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

M-07-2761

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FILED UNDER SEAL

UNITED STATES OF AMERICA

COMPLAINT AND AFFIDAVIT IN
SUPPORT OF AN ARREST WARRANT

- against -

(18 U.S.C. § 1029(a)(3))

RAFAQAT ALI,
also known as "Mohammad
Shah" and "Mohammad Raza,"

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

RYAN SAVAGE, being duly sworn, deposes and states that he is a Special Agent with United States Secret Service, duly appointed according to law and acting as such.

Upon information and belief, in or about and between January 2002 and March 2006, within the Eastern District of New York and elsewhere, the defendant RAFAQAT ALI, also known as "Mohammad Raza" and "Mohammad Shah," did knowingly and with the intent to defraud possess fifteen or more unauthorized access devices.

(Title 18, United States Code, Sections 1029(a)(3))

The source of your deponent's information and the grounds for his belief are as follows:¹

1. I have been a Special Agent with the United States Secret Service ("Secret Service") for approximately two years. The source of my knowledge of this matter is based upon personal investigation, review of the case file as well as discussions with other law enforcement officers.

2. In connection with an ongoing investigation, in or about May 2004, Secret Service agents obtained photocopies of two New York State driver's licenses and accompanying social security cards in the names "Mohammad Raza" and "Mohammad Shah." The driver's licenses appeared to have photographs of the same individual. Further investigation, including a review of government records and interviews with multiple witnesses, suggested to Secret Service agents that the individual pictured in the driver's licenses was in fact the defendant RAFAQAT ALI.

3. On July 6, 2005, Secret Service agents went to the address where the defendant RAFAQAT ALI was believed to reside in order to conduct an interview. The defendant RAFAQAT ALI opened the door and agents visually confirmed that the defendant RAFAQAT

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.


ALI appeared to be the individual pictured in the driver's licenses of "Mohammad Raza" and "Mohammad Shah." Secret service agents also noted that many credit cards were plainly visible in the residence.

4. After the agents identified themselves, the defendant RAFAQAT ALI agreed to answer questions and consented to a search of the residence. When asked about the "Mohammad Raza" and "Mohammad Shah" identities, the defendant RAFAQAT ALI admitted, in sum and in substance, that he had created these false identities. The defendant RAFAQAT ALI also admitted, in sum and in substance, that he had used the identity of "Mohammad Shah" to obtain and charge credit cards that he did not re-pay. The defendant RAFAQAT ALI also admitted, in sum and in substance, to creating other false identities, which were also used to obtain credit cards.

5. Special agents recovered approximately 30 credit cards in various names from the defendant's residence on July 6, 2005. A review of credit records pertaining to those various credit card identities shows an aggregate loss amount of over \$90,000.²

² It should also be noted that the loss pertains to institutions that are insured by the Federal Deposit Insurance Corporation.

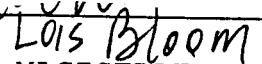
WHEREFORE, your deponent respectfully requests that the defendant RAFAQAT ALI, also known as "Mohammad Raza" and "Mohammad Shah," be dealt with according to law.



RYAN SAVAGE
Special Agent
United States Secret Service

Sworn to before me this
1st day of March, 2007

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THE HONORABLE LOIS BLOOM
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK